



ICEMAN GROUP AUSTRALIA

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ABN:86 764 020 858 ACN:093 555 394 RTA:AU00125

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Iceman Group Australia Privacy Policy

1. Introduction

- 1.1 In the course of our business in Australia, there are circumstances where we, being Iceman Group Australia ABN 86 764 020 858, Iceman Transport Refrigeration Repairs Pty Ltd ACN 093 555 394, Iceman Trailer Hire Pty Ltd ABN 48 157 950 813, Iceman Services Pty Ltd ABN 16 066 441 281, Iceman Corporation Pty Ltd ACN 131 939 476 and Thermaxx Qld Pty Ltd ABN 41 166 508 863 collect personal information. This privacy policy has been developed to ensure that such information is handled appropriately.
- 1.2 We are committed to complying with the *Privacy Act 1988 (Cth) (Privacy Act)* in relation to all personal information we collect. Our commitment is demonstrated in this policy. The Privacy Act incorporates the Australian Privacy Principles (**APPs**). The APPs set out the way in which personal information must be treated.
- 1.3 This privacy policy also incorporates our policy on managing credit information (see particularly section 8 onwards).

Who does the privacy policy apply to?

- 1.4 This policy applies to any person for whom we currently hold, or may in the future collect, personal information. Broadly, we only collect personal information from customers, subcontractors and agents who perform services on our behalf, and from prospective employees.

What information does the privacy policy apply to?

- 1.5 This policy applies to personal information. In broad terms, 'personal information' is information or opinions relating to a particular individual who can be identified.
- 1.6 Information is not personal information where the information cannot be linked to an identifiable individual.

2. How do we manage the personal information we collect?

- 2.1 We manage the personal information we collect in numerous ways, such as by:
 - (a) implementing procedures for identifying and managing privacy risks at each stage of the information lifecycle, including collection, use, disclosure, storage, destruction or de-identification;
 - (b) implementing security systems for protecting personal information from misuse, interference and loss from unauthorised access, modification or disclosure;
 - (c) providing staff with training on privacy issues;
 - (d) appropriately supervising staff who regularly handle personal information;
 - (e) implementing mechanisms to ensure any agents or contractors who deal with us comply with the APPs;



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- (f) implementing procedures for identifying and reporting privacy breaches and for receiving and responding to complaints;
 - (g) appointing a privacy officer within the business to monitor privacy compliance; and
- 2.2 We will take reasonable steps to destroy or permanently de-identify personal information if that information is no longer needed for the purposes for which we are authorised to use it.
- 2.3 Because the nature of our business primarily involves refrigerated transport hire, repair or maintenance services, it is generally not possible to use a pseudonym or remain anonymous when dealing with us. If you wish to use a pseudonym or remain anonymous when dealing with us, you should notify us and we will use our best endeavours to accommodate your request subject to our ability to perform the services.

3. What kinds of information do we collect and hold?

- 3.1 We may collect and hold personal information about you, which may include:
- (a) sensitive information (see below);
 - (b) contact information;
 - (c) financial and credit information;
 - (d) date and place of birth;
 - (e) gender;
 - (f) employment arrangements and history;
 - (g) education details;
 - (h) trade qualifications;
 - (i) credit information;
 - (j) banking and credit card details; and
 - (k) any other personal information required to provide the services to you.

Sensitive information

- 3.2 'Sensitive information' is a subset of personal information and includes personal information that may have serious ramifications for the individual concerned if used inappropriately.
- 3.3 Generally, we do not collect sensitive information about customers.
- 3.4 However, we may collect sensitive information from prospective employees, such as:
- (a) health information;
 - (b) membership of professional or trade associations.
- 3.5 We will not collect sensitive information without the individual's consent to whom the information relates unless permitted under the Privacy Act.



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4. How and when do we collect personal information?

- 4.1 Our usual approach to collecting personal information is to collect it directly from you.
- 4.2 We may also collect personal information in other ways, which might include:
- (a) through our credit application form;
 - (b) through other Iceman Group Australia forms;
 - (c) through our website;
 - (d) through referrals from individuals or other entities;
 - (e) from companies at which you are employed;
 - (f) from third party providers and suppliers;
 - (g) through trade and business events; and
 - (h) from colleagues, associates or relatives of yours (where necessary, we will make reasonable enquiries to verify the information).

5. How do we hold personal information?

- 5.1 Our usual approach to holding personal information includes:
- (a) physically:
 - (i) at our premises (securely); and
 - (ii) off-site, by third party physical storage providers (securely);
 - (b) electronically:
 - (i) on secure online servers;
 - (ii) on a private cloud; and
 - (iii) by a third party data storage provider.
- 5.2 We secure the personal information we hold in numerous ways, including:
- (a) using secure servers to store personal information;
 - (b) using unique usernames, passwords and other protections on systems that can access personal information; and
 - (c) holding certain sensitive documents securely.



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6. Why do we collect, hold, use or disclose personal information?

- 6.1 We are a refrigerated transport hire, repair and maintenance business that provides services to businesses and consumers throughout Queensland.
- 6.2 We take reasonable steps to use and disclose personal information for the primary purpose for which we collect it. The primary purpose for which we collect your personal information is generally to provide the refrigerated transport hire, repair and maintenance services you have requested for you or your business.
- 6.3 In the case of potential employees, the primary purpose the information is collected is to assess the individual's suitability for employment.
- 6.4 Personal information may also be used or disclosed by us for secondary purposes which are within an individual's reasonable expectations and which are related to the primary purpose of collection.
- 6.5 For example, we may collect and use your personal information:
- (a) to assess eligibility for credit;
 - (b) to keep record of transactions to assist in future enquiries and enhance our customer relationship with you; and
 - (c) to send you special offers in relation to our services.
- 6.6 We may disclose personal information to:
- (a) government bodies;
 - (b) other service providers or contractors in order to provide the product or service for you, or to assist our functions or activities (such as debt collection agencies, suppliers or legal firms);
 - (c) other third parties with your consent;
 - (d) our third party technology providers such as our data storage providers and website providers.
- 6.7 Otherwise, we will only disclose personal information to third parties if permitted by the Privacy Act.

7. Will we disclose personal information outside Australia?

- 7.1 We do not disclose personal information outside of Australia.

8. How do we manage your credit information?

What kinds of credit information may we collect?

In the course of providing our services to a customer, we may collect and hold the following kinds of credit information:

- (a) your identification information;
- (b) information about any credit that has been provided to you;
- (c) your repayment history;



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- (d) information about your overdue payments; and
- (e) any publicly available information about your credit worthiness.

8.2 In some circumstances, we may collect credit information and personal information from credit reporting bodies (e.g. Veda). The kinds of information we may collect include any of those kinds of information outlined in sections 3.1 and 8.2 of this policy.

8.3 We may also collect personal information which may affect your credit worthiness from other credit providers (e.g. trade referees) that may collect that information from credit reporting bodies. The kinds of personal information we collect may include any of those kinds of personal information outlined in sections 3.1 of this policy.

How and when do we collect credit information?

8.4 In most cases, we will only collect credit information about you directly from you or from your trade referees.

8.5 We may also collect credit information about you from:

- (a) government bodies;
- (b) credit reporting bodies;
- (c) banks and other credit providers;
- (d) other individuals and entities via referrals; and
- (e) other suppliers and creditors.

How do we store and hold the credit information?

8.6 We store and hold credit information in the same manner as outlined in section 5 of this policy.

Why do we collect the credit information?

8.7 Our usual purpose for collecting, holding, using and disclosing credit information about you is to enable us to provide you with the requested product or service.

8.8 We may also collect the credit information:

- (a) to process payments;
- (b) to assess eligibility for credit; and
- (c) for any other purpose that we consider necessary to best provide you with our service.

Overseas disclosure of the credit information

8.9 We will not disclose your credit information to entities without an Australian link unless you expressly request us to.

How can I access my credit information, correct errors or make a complaint?

8.10 You can access and correct your credit information, or complain about a breach of your privacy in the same manner as set out in section 9 of this policy.



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9. How do you make complaints and access and correct your personal information or credit information?

9.1 It is important that the information we hold about you is up-to-date. You should contact us if your personal information changes.

Access to information and correcting personal information

9.2 You may request access to the personal information held by us or ask us for your personal information to be corrected by using the contact details in this section.

9.3 We will grant you access to your personal information as soon as possible, subject to the request circumstances.

9.4 In keeping with our commitment to protect the privacy of personal information, we may not disclose personal information to you without proof of identity.

9.5 We may deny access to personal information if:

- (a) the request is unreasonable;
- (b) providing access would have an unreasonable impact on the privacy of another person;
- (c) providing access would pose a serious and imminent threat to the life or health of any person;
- (d) providing access would compromise our professional obligations; or
- (e) there are other legal grounds to deny the request.

9.6 We may charge a fee for reasonable costs incurred in responding to an access request. The fee (if any) will be disclosed prior to it being levied.

9.7 If the personal information we hold is not accurate, complete and up-to-date, we will take reasonable steps to correct it so that it is accurate, complete and up-to-date, where it is appropriate to do so.

Complaints

9.8 If you wish to complain about an alleged privacy breach, then you must follow the following process:

- (a) The complaint must be firstly made to us in writing, using the contact details in this section. We will have a reasonable time to respond to the complaint.
- (b) In the unlikely event the privacy issue cannot be resolved, you may take your complaint to the Office of the Australian Information Commissioner.

Who to contact

9.9 A person may make a complaint or request to access or correct personal information about them held by us. Such a request must be made in writing to the following address:

Privacy Officer: Shaun Howard
Postal Address: PO Box 241, Cannon Hill QLD 4170
Telephone number: 07 3390 7800
Email address: shaun@iceman.com.au



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10. Changes to the policy

- 10.1 We may update, modify or remove this policy at any time without prior notice. Any changes to the privacy policy will be published on our website.

This policy is effective from March 2014. If you have any comments on the policy, please contact the privacy officer with the contact details in section 9 of this policy.